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C. REMARKS

1. Summary of the Claims

Claims 1-21 are currently pending in the application. Claims 1, 8, 14, and 21 are independent claims. Claim 13 has been canceled in this Supplemental Response. No claims have been amended in this Supplemental Response. Independent claim 21 has been added. No new matter has been added. Consideration of the newly added claim is respectfully requested.

2. Claim Rejections 35 U.S.C. § 103

Claims 1-20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Santoro et al. (U.S. Patent No. 6,724,403, hereinafter "Santoro") in view of Hibino et al. (U.S. Patent No. 5,909,241, hereinafter "Hibino"). Applicant traversed these rejections in the Response filed March 22, 2005. In this Supplemental Response, Applicant directs the Examiner's attention to the patentability of new claim 21 over the cited references.

3. New Claim 21

Applicant's new independent claim 21 includes limitations found in original claims 1-7. As discussed in Applicant's Response filed March 22, 2005, the art cited by the Examiner does not teach the limitations presented in claims 1-7 (which have been incorporated in new claim 21).

Independent claim 21 is directed to "displaying graphical images on a display device attached to a client computer" with limitations comprising:

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- requesting a thumbtable matrix and a first larger image from a server computer system via a computer network;
- receiving, from the server, the thumbtable matrix and the first larger image, wherein the thumbtable matrix includes one or more thumbnails organized in a first matrix configuration, wherein the first larger image corresponds to one of the thumbnails and wherein at least one of the thumbnails is selected from the group consisting of a digital picture, a video clip, and a live video feed;
- displaying, on the display device, the thumbtable matrix concurrently with the first larger image in a display window;
- identifying a horizontal scroll configuration for the display window;
- selecting a next scroll button;
- determining whether the thumbtable matrix is displaying a last thumbnail;
- scrolling the thumbtable matrix in response to the determination;
- identifying a vertical scroll configuration;
- selecting a back scroll button;
- determining whether the thumbtable matrix is displaying a first thumbnail;
- scrolling the thumbtable matrix in response to the determination;

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- receiving a selection corresponding to one of the displayed thumbnails;
- retrieving a second larger image corresponding to the selected thumbnail;
- displaying the second larger image on the display window concurrently with the displayed thumbnails;
- receiving a second matrix configuration selection from a user;
- retrieving the second matrix configuration; and
- displaying the thumbtable matrix corresponding to the second matrix configuration selection, wherein the appearance of the displayed thumbtable matrix using the second matrix configuration is different from the appearance of the displayed thumbtable matrix using the first matrix configuration.

Regarding the limitation of Applicant's claim 21 where Applicant claims "displaying, on the display device, the thumbtable matrix concurrently with the first larger image in a display window," the Office Action alleges that Hibino discloses this limitation in column 5, lines 19-40. After further review of the particular reference in Hibino, Hibino never teaches or suggests displaying a larger image concurrently with thumbnails on a single display window. Rather, the reference discusses Figure 44, which includes various frame displays for a user to view, none of which include displaying a larger image concurrently with thumbnails. In column 5, lines 19-40, Hibino describes four image-displaying modes, which are as follows.

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- a) Displaying a frame number (e.g., "1," "2," etc.) for each frame whose corresponding magnetic information is modified. In this mode, Hibino teaches only displaying numeric values that correspond to a film frame, and never teaches or suggests displaying thumbnails, let alone displaying a larger image concurrently with thumbnails.
- b) Displaying all frame numbers in a film strip and highlighting the frame numbers whose corresponding magnetic information are modified. In this mode, Hibino again teaches only displaying numeric values that correspond to a film frame, and never teaches or suggests displaying thumbnails, let alone displaying a larger image concurrently with thumbnails.
- c) Displaying all frame thumbnails in a film strip and highlighting the frame thumbnails whose corresponding magnetic information are modified. In this mode, Hibino teaches displaying thumbnails on a screen but, however, Hibino never teaches displaying a larger image concurrently with the thumbnails.
- d) Displaying a frame number and its contents (e.g., print type, date, etc) for each for each frame whose corresponding magnetic information is modified. In this mode, Hibino teaches only displaying numeric values that correspond to a film frame along with text that corresponds to a film frame's magnetic information. Hibino never teaches or suggests displaying thumbnails, let alone displaying a larger image concurrently with thumbnails in this mode.

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As can be seen above and in viewing Figure 44, the Office Action's reference to Hibino never teaches or suggests displaying a larger image concurrently with thumbnails on a single display window as claimed by Applicant. As a note, in Figures 40 and 41, Hibino shows different screen displays whereby two of the screen displays are larger images (Figure 40a/41a and 40c/41c) and one of the screen displays includes thumbnails (Figure 40b/41b). However, Hibino teaches that these are three different screen displays and that a user navigates from one screen display to another screen display. Hibino solidifies this point by using three separate figures (a, b, and c) to illustrate the three different screen displays. This is completely different than Applicant's invention as claimed, in that Applicant displays thumbnails AND a larger image concurrently on the same display window.

The Office Action admits that Santoro does not teach the *displaying* limitation of claim 21, and, upon review of Santoro, Applicant agrees that it does not. Therefore, since neither Santoro nor Hibino, either alone or in combination with one another, teach or suggest all the limitations of Applicant's claim 21, claim 21 is allowable over Santoro in view of Hibino.

Claim 21 also includes the limitations of:

- identifying a horizontal scroll configuration;
- selecting a next scroll button;
- determining whether the thumbtable matrix is displaying a last thumbnail; and
- scrolling the thumbtable matrix in response to the determination.

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Applicant claims "identifying a horizontal scroll configuration," which corresponds to Applicant's invention scrolling in a horizontal direction. The Office Action contends that Santoro teaches all the limitations included in this limitation, and cites column 10, lines 1 through 34 in Santoro as a basis for rejecting this limitation. Upon closer inspection of the reference, however, Santoro never teaches or suggests any of these limitations, let alone "identifying a horizontal scroll configuration." Rather, column 10, lines 1 through 34 discuss a tile data structure that does not include a scroll button or a thumbtable matrix.

The Office Action does not allege that Hibino teaches any of these limitations. Therefore, since neither Santoro nor Hibino, either alone or in combination with one another, teach or suggest these limitations that have been incorporated into claim 21, claim 21 is additionally allowable over Santoro in view of Hibino for this reason.

Consequently, based on the foregoing, Applicant respectfully submits that new claim 21 is clearly patentable over the art of record. Accordingly, an early allowance of claim 21 is respectfully requested.

CONCLUSION

As a result of the foregoing, it is asserted by Applicant that new claim 21 added in this Supplemental Response is in condition for allowance, and Applicant respectfully requests an early allowance of this claim.

Applicant respectfully requests that the Examiner contact the Applicant's attorney listed below if the Examiner believes


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that such a discussion would be helpful in resolving any remaining questions or issues related to this Application.

Respectfully submitted,

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